

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie (Ret.),
Special Discovery Master

**[PROPOSED] ORDER
GRANTING CROSS MOTION
FOR PROTECTIVE ORDER**

THIS MATTER having come before Court upon Plaintiffs' Motion to Compel the Custodial File of Baohua Chen and the ZHP Parties' Cross Motion for Protective Order Precluding the Production of the Custodial File of Baohua Chen, on notice to liaison counsel for Plaintiffs, and the Court having considered the parties' submissions; and for good cause shown:

It is, on this _____ day of _____ 2021,

ORDERED AND ADJUDGED that Plaintiffs' Motion to Compel the Custodial File of Baohua Chen is **DENIED IN FULL**;

IT IS FURTHER ORDERED that the ZHP Parties' Cross Motion for Protective Order Precluding the Production of the Custodial File of Baohua Chen is **GRANTED IN FULL** and the custodial file of Baohua Chen shall not be produced to Plaintiffs.

Hon. Thomas Vanaskie (Ret.)
Special Discovery Master